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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAN FRANCISCO BAYKEEPER, a non-profit
corporation,

Plaintiff,

v.

JAMES F. TAYLOR dba PINOLE RODEO
AUTO WRECKERS,

Defendant.

Civil No. 4:15-cv-05825-MEJ

REQUEST TO EXTEND TIME TO
RESPOND TO COMPLAINT; ~~PROPOSED~~
ORDER

(Federal Water Pollution Control Act, 33
U.S.C. § 1251 *et seq.*)

Honorable Maria-Elena James

1 WHEREAS, on December 18, 2015, Plaintiff San Francisco Baykeeper (“Plaintiff”) filed the
2 above-entitled action;

3 WHEREAS, on February 17, 2016, Plaintiff transmitted to Defendant a Request for Waiver of
4 the Service of Summons;

5 WHEREAS, on March 9, 2016, Plaintiff received Defendant’s executed waiver for service of
6 summons, and Plaintiff filed the executed waiver for service of summons;

7 WHEREAS, Defendant has chosen to proceed as a *pro se* litigant, and has not appeared in this
8 matter;

9 WHEREAS, pursuant to Rule 4(d)(3) of the Federal Rules of Civil Procedure, Defendant
10 currently has until April 18, 2016 to respond to the complaint;

11 WHEREAS, Plaintiff and Defendant (collectively, the “Parties”) have been working together
12 in good faith to reach a settlement agreement in this action;

13 WHEREAS, the Parties desire to extend the time for Defendant to respond to the complaint
14 until May 23, 2016;

15 WHEREAS, such an extension of time within which to answer or otherwise respond to the
16 complaint will not alter the date of any event or any deadline already fixed by Court Order;

17 WHEREAS, Plaintiff requests, upon the Court’s approval, to extend the time for Defendant to
18 respond to the complaint to May 23, 2016, in order to give the Parties a chance to complete settlement
19 negotiations;

20 WHEREFORE, Plaintiff respectfully requests the Court to approve and enter the Proposed
21 Order below.

22
23 DATE: March 24, 2016

Respectfully Submitted,

24 /s/ Nicole C. Sasaki

25 _____
26 Nicole C. Sasaki
27 Attorneys for Plaintiff
SAN FRANCISCO BAYKEEPER

~~[PROPOSED]~~ ORDER

GOOD CAUSE APPEARING,

1. Defendant's time to respond to the complaint shall be extended to May 23, 2016.

IT IS SO ORDERED.

Date: March 24, 2016

NORTHERN DISTRICT OF CALIFORNIA



Honorable Maria-Elena James
United States District Court